

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THE NIELSEN COMPANY (US), LLC,)
Plaintiff,)
v.) C.A. No. 22-1345-CJB
TVISION INSIGHTS, INC.,)
Defendant.) **JURY TRIAL DEMANDED**

**PLAINTIFF THE NIELSEN COMPANY (US), LLC'S
MOTION TO STRIKE DEFENDANT TVISION INSIGHTS, INC.'S
SIXTH AFFIRMATIVE DEFENSE OF INEQUITABLE CONDUCT**

Plaintiff The Nielsen Company (US), LLC (“Plaintiff”), by and through its undersigned counsel, respectfully moves to strike Defendant TVision Insights, Inc.’s Sixth Affirmative Defense of Inequitable Conduct (D.I. 21).

The specific grounds for this Motion are set forth in Plaintiff's accompanying letter, submitted contemporaneously herewith.

OF COUNSEL:

Steven Yovits
Constantine Koutsoubas
Melvin Gaddy
KELLEY DRYE & WARREN LLP
333 West Wacker Drive
Chicago, IL 60606
Tel: (312) 857-7070

Clifford Katz
Jolie Brett Scheneman
KELLEY DRYE & WARREN LLP
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Tel: (212) 808-7800

Respectfully submitted,
POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Andrew L. Brown (#6766)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
abrown@potteranderson.com

*Attorneys for Plaintiff The Nielsen Company
(US), LLC*

Dated: February 20, 2023
10647519 / 14944-00004